

### **REMARKS/ARGUMENTS**

Claims 1-42, 51-60, 69 and 72-79 are pending in the application. Claims 1-39, 43-57 and 61-69 were previously withdrawn. Claims 43-50, 61-68, 70 and 71 are canceled without prejudice. New claims 72-79 have been added. Claims 40 and 58 are amended herein.

#### **I. Rejection of Claims 70 and 71 Based on 35 U.S.C. § 112**

The Examiner has rejected claims 70 and 71 under 35 USC §112 as being indefinite. Applicant has canceled claims 70 and 71. Applicant submits that the Examiner's rejection is now moot.

#### **II. Rejection of Claims 40-42 and 58-60 Based on 35 U.S.C. § 102**

The Examiner has rejected claims 40-42 and 58-60 under 35 USC 102(e) as being anticipated by Gentner (5,724,595) stating:

6. Claims 40-42 and 58-60 are rejected under 35 U.S.C. 102(e) as being anticipated by Gentner (5,724,595).

7. Claims 40-42, 58-60, 70 and 71 are rejected under 35 U.S.C. 103(a) as being unpatentable over Gentner (5,724,595).

Regarding independent claims 40 and 58, refer to Gentner's abstract, figures 2-4, and column 2 (line 63) through 4 (line 19). Gentner discloses:

“creating a link between a first lexia and a second lexia”. See abstract, in which he discloses *creating a link in an original hypertext document to target hypertext document*.

“displaying a first lexia in a lexia display window on a display screen”. See figure 2(10).

“displaying a graphical element representing a second lexia in a hypermedia work display window on said display screen.” See figures 2 and 3 – anchor icon. The hypermedia work display window includes the entire display (14).

“selecting a location for an activation area for a link in said lexia display window”. See figure 2 (16).

“selecting said graphical element in said hypermedia work display window”. See column 3 (top), in which he discloses *control icons 18, called the “drag icons”, which in the preferred embodiment in a representation of a ship's anchor*. Refer also to column 3 (lines 34-55), in which Gentner discloses *moving the mouse cursor over the drag target in the control area of the target window and pressing the select button on the mouse*.

With respect to the limitation, “wherein said hypermedia display window is configured to **act on** at least said first lexia and said second lexia”, the inclusion of both first and second “lexia” (10 and 12 in figures 2 and 3) within the display window (14) of Gentner inherently shows that the window “acts on” the “first and second lexia.” The “act” of displaying both first and second “lexia” constitutes “acting on” them.

Regarding dependent claims 41-42 and 59-60, refer to Gentner's figure 3 (20) and column 3 (lines 51-54), in which he discloses

“extracting a label”, and “said link activation area comprises said label” --  
- *the title of the target page is inserted into the text of the original page at  
the location of the mouse pointer.*

As per dependent claims 70 and 71, Gentner discloses obtaining the graphical element by capturing prominent features of the second lexia (col. 3, lines 2-6), since the ship’s anchor representation captures the feature of the second lexia document being the anchor target.

Applicant respectfully disagrees and submits that claims 40-42 and 58-60 are allowable for at least the reasons detailed below.

**A. Independent Claims 40 and 58**

Applicant has amended claims 40 and 58 while considering the Examiner's remarks with regard to previous amendments and argument.

Applicant respectfully disagrees that independent claims 40 and 58, as amended in the current response, are anticipated or suggested by Gentner for the following reasons.

Gentner does not teach, suggest or describe a graphical element that is dynamically generated to capture an overview image of a second lexia to visually represent the second lexia as recited in independent claims 40 and 58. In Gentner the iconic representation (i.e. Ship Anchor icon) indicates the location of a link to a target page, which is further utilized as a push-button to initiate the creation of

a link. In Gentner, the same icon (e.g. a ship's anchor) is utilized to indicate a location of a link regardless of the visual aspects of the target and does not provide a distinctive visual cue of the target page, because the icon is a representation of a link rather than a representation of the media work.

In Gentner, the graphical representation is not algorithmically generated to show a target lexia's overview image, as it is in claim 40 of the present application. Furthermore, the graphical representation in Gentner is not dynamically generated, as it is in claim 58 of the present application. Therefore, independent claims 40 and 58 are allowable over the cited art.

**B. Dependent Claims 41, 42 and 59-60**

Applicant respectfully submits that claims 41, 42 and 59-60, being dependent upon respective allowable base claims, are also allowable for at least the foregoing reasons stated above.

**III. New Claims 72-79**

Applicant submits herewith new claims 72-79 for consideration. New claims 72-79 are fully supported by the specification and drawings as originally filed, and no new matter is introduced.

In his response to Applicant's arguments, the Examiner stated that a "caricature of the target page" was not an element of the claims at issue.


Applicant submits that independent claims 72 and 76 do make reference to generating a caricature of a second lexia. Applicant submits that independent claims 72 and 76, as well as dependent claims 73-75 and 77-79, are therefore allowable for at least the reason that the prior art does not teach or suggest generating a caricature as claimed.

Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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